

EG&G ROCKY FLATS



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92-RF-5476

May 14, 1992

Terry A. Vaeth
Manager
DOE, RFO

Attn: J. K. Hartman

MODIFICATION OF THE 'BASELINE' COMPREHENSIVE TREATMENT AND MANAGEMENT PLAN -
JMK-0457-92

We have given careful consideration to your recent proposal to use off-site shipment of LDR wastes as the primary strategy articulated in the Comprehensive Treatment and Management Plan (CTMP). The CTMP is the principal deliverable under the FFCA II and is due to the Environmental Protection Agency (EPA) on June 10, 1992. Off-site shipment of waste for treatment at other facilities is certainly one sensible approach to managing the RFP LDR waste problem. However, for the below reasons, EG&G does not believe that, at this time, it should be designated as the primary strategy for managing LDR wastes. Off-site shipment, of course, remains an alternative strategy that is part of the existing CTMP.

The principal impediment to selecting, at this time, the offsite shipment alternative as the recommended method in the CTMP is the absence of control and influence over essential elements of the plan. Specifically, off-site shipment requires the simultaneous cooperation of the DOE, state governments (at the sending and receiving sites and through which the treated and untreated waste is shipped), as well as the permitting authorities in the states where the waste will be treated. Further impediments include citizen group opposition and legal action similar to that experienced at WIPP. This lack of control over milestone events seriously detracts from the credibility of a strategy that uses off-site shipment as the baseline approach.

We recommend that the following approach be pursued: 1) Continue the baseline approach that has been developed by EG&G with the participation of DOE, and 2) Expand the CTMP's current coverage of the off-site shipment alternative with a detailed chapter discussing this approach. This expanded coverage should include DOE's plans for handling the national issues associated with shipping and treating Rocky Flats' LDR waste at other facilities. This expanded section would also note that the plan can be amended to eliminate baseline systems that are obviated by successful off-site shipment. As off-site shipments become more promising the investment in baseline resources will decrease from the expected final implementation cost of \$500 million to \$1 billion.

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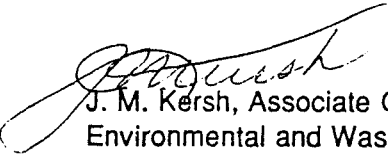
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I wish to emphasize that this recommended approach is consistent with FFCA II (paragraphs 16B and C), which allows both the revision or termination of technology pathways, or the inception of new and promising pathways as we have more definitive information as to the technical and political viability of specific pathways. These changes to the baseline approach are accomplished through the Annual Progress Report, with the regulators' acceptance of the pathway change. However, if off-site shipment is proposed as the primary approach, no assurance can be given to the regulators that LDR waste will ever be shipped from Rocky Flats. Thus, a CTMP which proposes transportation as the primary solution to RFP's LDR problem creates substantial risk of being deemed unresponsive by EPA and the State. The consequences of this action include potential FFCA II compliance problems and extreme difficulty in the negotiations with the State on FFCA III, presently scheduled to begin on June 8, 1992.

Furthermore, making the off-site shipment and treatment alternative primary represents a fundamental change in the CTMP which because of the complexity of the subject cannot be adequately addressed on such short notice. If DOE is committed to the off-site shipment alternative, we request appropriate written direction to that effect and a commitment that DOE, RFO will use its best efforts to obtain a reasonable extension on the CTMP's due date to EPA.

In summary, EG&G believes that the cost of the CTMP as currently drafted will be less than \$1 billion and that on-site treatment is currently the only alternative which would be perceived by the regulators as credible. Moreover, it is important to recognize that any treatment plan is several years away from implementation; therefore, there will be ample time to address the off-site treatment alternative in an Annual Progress Report when sufficient information becomes available to support that alternative.

If you have any questions, please contact me at extension 4111.



J. M. Kersh, Associate General Manager
Environmental and Waste Management

TLR:cab

Orig. and 1 cc - T. A. Vaeth